

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

*WILLIAM PERRIN,* )  
 )  
 Plaintiff, )  
 )  
 v. ) Case No. 4:15-cv-00850-HEA  
 )  
*RUBINBROWN, LLP,* )  
 )  
 Defendant. )  
 )  
 )

## **JOINT MOTION FOR PROTECTIVE ORDER**

COME NOW Plaintiff and Defendant, and for their Joint Motion for Protective Order, state as follows:

1. The parties are engaging in initial disclosures and written discovery.
2. RubinBrown, LLP has identified certain confidential and proprietary information and documents, and desires to produce those materials to Plaintiff's counsel. These documents include confidential records pertaining to applicants and employees, including personal credit information.

WHEREFORE, the parties respectfully request this Court enter the Protective Order provided in Exhibit A, and for all such other and further relief as this Court deems proper and just.

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**Certificate of Service**

I certify that on this 22nd day of November 2016, this document was filed electronically with the Clerk of the Court, to be served by operation of the Court's electronic filing system upon the following counsel of record:

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/s/ Narcisa P. Symank

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